

## UNITED STATES DISTRICT COURT

## Eastern DISTRICT OF NEW YORK

2019-cr-127

USA ,

Plaintiff,

v.

Lucio Celli.

## MOTION TO COMPEL FINANCIAL DISCLOSURE AND REQUEST FORENSIC AUDIT BASED ON JUDICIAL MISCONDUCT AND POLITICAL INFLUENCE IN EMPLOYMENT MATTERS

COMES NOW Plaintiff, pro se, and respectfully moves this Court to:

1. Compel full **financial disclosure** from Judges **Engelmayer, Rearden, Wolfe, Livingston, AUSA Durham, and AUSA Smith**;
2. Appoint a **neutral forensic accountant** to conduct a financial and conflict-of-interest audit;
3. Investigate improper **political coordination between federal judges and U.S. Senators Chuck Schumer and Kirsten Gillibrand**;
4. Refer ethical and legal violations for review to the **Judicial Council, Department of Justice, and Congressional Ethics Committees**.
5. Engelmayer took a bribe to cover up Randi's involvement and to treat me like an animal who has no rights because Randi can buy any judicial decision that she wants because she is he king marker
6. Egnelmayer helped Randi obtain employment decisions in pension, wages and etc over a penis pic and he is a petty little man who retaliates because Randi bribed Wolfe and Livingston

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**I. Grounds for Relief – Political Influence and Judicial Misconduct**

Plaintiff alleges the following:

1. **Randi Weingarten**, a powerful union official, received **judicially assisted employment decisions and legal protection** as a result of **undue influence** from **Senators Schumer and Gillibrand**;
2. Judges **Engelmayer, Rearden, Wolfe, and Livingston** are implicated in a pattern of decisions that:
  - o Ignored binding facts and rulings favorable to Plaintiff;
  - o Withheld restitution and medical access based on retaliatory motives;
  - o Selectively applied relief to Weingarten while denying it to Plaintiff;
  - o Operated under political pressure and external influence;
3. **Gratuitous use of union resources**—in the form of staff, legal support, publicity, and undisclosed cash payments—were exchanged to protect Weingarten from accountability.

This conduct, if proven, violates:

- The **Code of Conduct for U.S. Judges**, particularly **Canon 5: Judges shall not engage in political activity**;
- **18 U.S.C. § 201 (Bribery)** and **§ 1346 (Honest Services Fraud)**;
- **18 U.S.C. § 246**, for obstructing Plaintiff's access to federally supported benefits;
- Established precedents under *Caperton v. Massey*, *McDonnell v. United States*, and *Dennis v. Sparks*.

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## II. Financial and Political Conflicts – Request for Forensic Audit

Plaintiff requests a full and independent **forensic audit** to determine whether:

- Judges or staff received **undisclosed gifts, campaign assistance, or benefits** from Randi Weingarten or related entities;
- Union funds, offices, or influence were used as a “**thing of value**” to induce or maintain favorable treatment in litigation;
- Senators Schumer and Gillibrand engaged in **backchannel communications or unethical conduct** designed to pressure judicial officers for political or retaliatory purposes.

This audit is necessary to uncover any **financial irregularities, unexplained deposits, or conflict-related benefits**, especially where **cash bribes or free union resources** were involved—consistent with conduct found criminal in cases like *United States v. Seabrook*, *McDonnell*, and *Dennis*.

Everyone knows that there were no probable cause, they have evidence of Randi bribing judges, and prevents the facts of Randi Weingarten's criminal involvement in my case, like Wolfe's criminal conduct of switching transcript and Engelmayer covering up his conspiracy with Randi, COgna and Kellman—there are audios that DOJ has so no excuses and they need to be sanctioned

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### III. Relief Requested

Plaintiff respectfully requests that this Court:

1. **Compel public financial disclosures** from Judges Engelmayer, Rearden, Wolfe, and Livingston, including assets, gifts, and honoraria;
  2. **Appoint an independent forensic accountant** to audit any financial records, communications, or transactions implicating undue influence;
  3. **Order immediate recusal** of implicated judges pending outcome of this investigation;
  4. **Refer matters to the Judicial Council and DOJ Public Integrity Section;**
  5. Grant such other and further relief as may be appropriate in the interests of justice and public confidence in judicial impartiality.
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**Respectfully submitted,**

Lucio Celli

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### SUPPLEMENTAL MOTION TO COMPEL FINANCIAL DISCLOSURE AND FORENSIC AUDIT BASED ON JUDICIAL MISCONDUCT, CONCEALMENT OF EVIDENCE, AND POLITICAL INFLUENCE

COMES NOW Plaintiff, pro se, and respectfully moves this Court to:

1. Compel full **financial disclosure** from Judges **Engelmayer, Rearden, Wolfe, and Chief Judge Livingston**;
2. Wolfe took bribed to switch transcripts, steal 20k from parents, she and had her clerks cover the fact that I was denied every single right and over up over a illegal
3. Appoint a **neutral forensic accountant** to investigate financial and political irregularities;

4. Investigate the concealment of evidence tied to **Randi Weingarten's alleged criminal conspiracy with Silverman**, and political protection by **Senators Schumer and Gillibrand**;
  5. Refer ethical and legal violations to the appropriate judicial and federal authorities.
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## I. Overview of Misconduct – Kelly v. United States Standard

In **Kelly v. United States**, 140 S. Ct. 1565 (2020), the U.S. Supreme Court reaffirmed that **misuse of public authority for political retaliation** or personal favors, even in non-monetary contexts, is unconstitutional when it causes **fraudulent misrepresentation or obstruction of legitimate government functions**.

Here, Plaintiff alleges that:

- Judges **Engelmayer, Rearden, Wolfe, and Livingston** engaged in **selective rulings, suppression of key transcripts, and distortion of the factual record**;
  - These rulings were issued in **concert with political pressure** and served to protect Randi Weingarten, who received unjust legal advantage while Plaintiff was denied wages, benefits, and medical access;
  - **Randi Weingarten and attorney Thad Silverman** engaged in **criminal concealment of evidence** and orchestrated false filings and omissions—**with the full knowledge and support of these judicial actors**;
  - Plaintiff's rights to due process, medical treatment, and fair adjudication were obstructed, creating a structural violation of justice consistent with *Kelly*, *Caperton*, and *Dennis*.
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## II. Specific Allegations of Concealment and Coordination

1. **Silverman's communications were knowingly relied upon over valid court transcripts** to mislead the court regarding probation compliance;
2. **Kellman admitted** to collaborating with Judge Engelmayer in distorting Plaintiff's case outcome;
3. **All four judges** failed to act on this evidence and instead **aided in concealing Randi Weingarten's role in suppressing medical access, wages, and court orders**;
4. This judicial protection was politically motivated and potentially facilitated by **financial favors, campaign support, or union resources**, qualifying as “things of value” under *McDonnell v. United States*, 579 U.S. 550 (2016).

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### III. Request for Audit and Accountability

Plaintiff requests:

- A **court-appointed forensic accountant** to audit financial ties, unexplained assets, and communications between the judges, union agents, and political actors;
- Immediate disclosure of **gifts, donations, cash payments, or employment favors** connected to Randi Weingarten or the United Federation of Teachers (UFT);
- Referral to DOJ and judicial oversight panels under **18 U.S.C. §§ 201, 246, and 1346** (honest services fraud).

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### IV. Relief Requested

Plaintiff respectfully asks this Court to:

1. **Compel full financial disclosure** from Judges Engelmayer, Rearden, Wolfe, and Livingston;
2. Appoint a **forensic accountant** to review potential judicial corruption or political influence;
3. **Investigate and report** any concealment of criminal acts involving Weingarten and Silverman;
4. **Vacate all rulings** affected by this misconduct and consider sanctions, recusals, and criminal referral.

Respectfully submitted,  
Lucio Celli  
89 Widmer Road  
Wappingers Falls, New York 12590  
929-429-0155  
[Lucio.Celli.12@gmail.com](mailto:Lucio.Celli.12@gmail.com)

## Certificate of Service

I hereby certify that on [Date], a copy of the foregoing Motion to [Specify Relief Sought] was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

[Attorney's Name]